CONSTITUTIONAL LAW — SELECTIVE SERVICE REGULATIONS — DECISION BY LOCAL BOARD — JUDICIAL POWER OF REVIEWING ADMINISTRATIVE DETERMINATIONS. — The Selective Draft Act provided that the local and district boards finally decide exemption claims under regulations prescribed by the President. (ACT OF MAY 18, 1917, c. 15, 40 STAT. 76.) In filling out his questionnaire an alien friend by mistake waived his claim to exemption, and in ignorance of his right to have his questionnaire corrected, allowed the local board to induct him into service. After having been directed to appear for entrainment, he requested that his case be reopened and his questionnaire corrected. This was denied as, after induction, the local board could not reopen a case, the only remedy under the Selective Service Regulations being an appeal to the commanding officer of the mobilization camp. (SELECTIVE SERVICE REGULATIONS, §§ 99, 100, 139.) Advised that he was being unlawfully deprived of his liberty he refused to report, was arrested, and now applies for a writ of *habeas corpus* for his discharge. *Held*, that the petitioner be remanded. *Ex parte Kusweski*, 251 Fed. 977 (Dist. Ct., N. Dist., N. Y.).

The Selective Draft Act delegating to the President power to prescribe rules for the local and district boards in determining exemption claims, which determination was to be final, was a valid grant of administrative power. *Arver* v. *United States*, 245 U. S. 366, 38 Sup. Ct. 159. Administrative determinations of executive officials may be made final on questions of fact. *United States* v. *Ju Toy*, 198 U. S. 253; *Zakonaite* v. *Wolf*, 226 U. S. 272. *Cf. American School of Magnetic Healing* v. *McAnnulty*, 187 U. S. 94. An appeal, however, lies on questions of law. *Gonzales* v. *Williams*, 192 U. S. 1; *Grogiow* v. *Uhl*, 239 U. S. 3. See 29 HARV. L. REV. 215. Otherwise the only requisite is that a fair hearing or sufficient opportunity for one be given. *Chin Yow* v. *United States*, 208 U. S. 8. *Ex parte Lam Pui*, 217 Fed. 456. In the principal case the Selective Service Regulations were passed affording sufficient opportunities for the reopening and rehearing of cases. (SELECTIVE SERVICE REGULATIONS, §§ 99, 100.) But the petitioner failed to take advantage of such opportunities, and so was not denied a fair hearing. Thus, the decision having been made final by statute, the case falls within the doctrine that in such cases there is no judicial power of review on the ground that such procedure is in violation of the Fourteenth Amendment. *Franke* v. *Murray*, 248 Fed. 865; *In re Chan Foo Lin*, 156 C. C. A. 3, 243 Fed. 137; *United States* v. *Ju Toy*, *supra*. See 2 WILLOUGHBY, CONSTITUTION, 1278 *et seq.*

CONTRACTS — ILLEGALITY — CONTRACT MADE AS PART OF A SCHEME THE EXECUTION OF WHICH WOULD RESULT IN THE DISRUPTION OF AN ESSENTIAL WAR PLANT. — B, C, and D were essential employees, under contracts terminable at will, in the only factory in the country engaged in making gas masks. A, in order to disrupt the factory from a spirit of revenge against its owners, secured contracts from B, C, and D, whereby they agreed to work for A and for no one else for two years. In a suit by A for specific performance of the negative covenants, B, C, and D set up the defense of illegality and counterclaim for cancellation of the contracts as against public policy. *Held*, the contracts are voidable as against public policy and equity will order them canceled. *Driver* v. *Smith*, 104 Atl. 717 (N. J., 1918).

Contracts which tend to embarrass the government in its relations with foreign states, *e. g.*, by encouraging insurrection in such states, are against public policy. *Kennett* v. *Chambers*, 14 How. (U. S.) 38; *Gandolfo* v. *Hartman*, 49 Fed. 181. Trading with the enemy in time of war is illegal at common law. *Montgomery* v. *United States*, 15 Wall. (U. S.) 395; *Griswold* v. *Waddington*, 16 Johns. (N. Y.) 438. As regards internal affairs, a contract which tends to pervert or corrupt governmental machinery or officials is il-